

David Morris Clayman / דוד משה קליימן / אדם דוד קליימן, *Pro se*

FILED BY 403 D.C.

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA

SEP 10 2025

ANGELA E. NOBLE  
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S.D. OF FLA. - WPB

David Morris Clayman ( / אדם דוד  
דוד משה קליימן),  
Plaintiff,

vs.

UNITED STATES OF AMERICA  
et. al.

CASE NO. 9:25-CV-80890-WM

**PLAINTIFF'S MOTION TO PROTECT  
SACRED NAMES OF G-D IN CASE  
FILES FROM NONRELIGIOUS  
DESTRUCTION**

**PLAINTIFF'S MOTION TO PROTECT THE SACRED NAMES OF G-D IN  
COURT FILINGS AND RECORDS**

Plaintiff, appearing pro se, respectfully moves this Court for an Order protecting and preserving the sanctity of the Names of G-d that appear in printed filings, exhibits, and related court records generated in this action, and as grounds therefore states:

**I. INTRODUCTION**

In bringing this case before the Court, Plaintiff was required to submit excerpts of religious texts to make his full case most convincingly, including portions of the Talmud, that necessarily contain the sacred Names of G-d ("Shaimos"). Plaintiff made every reasonable effort to minimize the inclusion of these Names in pleadings. Nevertheless, certain occurrences appear in Plaintiff's Original Complaint, First Amended Complaint, and Second Amended Complaint, which have been filed with the Court and, in the case of the Original Complaint, served on Defendants via

1 sacred hard copy.

2  
3 Additionally, despite Plaintiff's specific request that the Government avoid reproducing these  
4 Names, the U.S. Attorney and Assistant U.S. Attorney have included the sacred Names of G-d in  
5 their filings, and further copies may exist in transcripts or other case materials. At present, there  
6 is no established convention for abbreviation or respectful substitution of the Names of G-d in  
7 federal filings, nor any plan for religiously appropriate handling of such documents during or  
8 after the pendency of this case.  
9

## 10 **II. RELIGIOUS SIGNIFICANCE AND NEED FOR ACCOMMODATION**

11  
12 According to Jewish custom, law, and practice, printed documents containing the Names of G-d  
13 require special handling and ultimately must be deposited in a genizah (a repository for sacred  
14 texts) or buried in a Jewish cemetery. Routine disposal or destruction—such as shredding—is a  
15 profound desecration and is religiously forbidden. Plaintiff, as a matter of sincerely held religious  
16 belief, has a duty to ensure that these documents are preserved and interred properly.  
17

18 This request does not extend to electronic case files or digital copies, which, under Jewish custom  
19 and law, do not require such treatment. The issue is confined exclusively to physical paper copies  
20 in the possession of the Court and the Defendants.  
21

## 22 **III. BUT-FOR CAUSATION AND PLAINTIFF'S RELIGIOUS RESPONSIBILITY**

23  
24 The sacred Names of G-d at issue would not have been printed but for Plaintiff's decision and  
25 effort to bring this action in federal court. The Court's filing requirements necessitated that  
26 Plaintiff include certain source texts in order to fully and accurately present his claims. Those  
27 filings, once served, created a stream of Shaimos that extends to Defendants' files, the Court's  
28

files, and transcripts or copies in the hands of the U.S. Attorney's Office.

Plaintiff acknowledges that by initiating this action, he bears a religious responsibility to ensure that the resulting Shaimos is handled in a manner consistent with Jewish custom and law. This Motion seeks to discharge that responsibility in a respectful and orderly way, without placing undue administrative burdens on the Court or Defendants.

#### IV. IDENTIFICATION OF SHAIMOS PAGES

Plaintiff provides below a listing of pages where sacred Names of G-d appear, based on his best review of filed documents to date. Plaintiff reserves the right to supplement this list as discovery and filings proceed. These page numbers match the Court's page numbering and electronic docket entry numbers are provided for convenient cross-reference.

- **Original Complaint (DE 1):** [p. 58, p. 60, p. 61, p. 62]
- **Cover Letter Sent to Defendants with Original Complaint Hard Copies ("Actually Protecting The National Motto – "In G-d We Trust") (No Docket Entry):** [p. 2]
- **First Amended Complaint (DE 19):** [p. 46, p. 48, p. 49, p. 50]
- **Appendix (Second Amended Complaint) to Motion for Leave to File Second Amended Complaint (DE 35):** [p. 87, p. 89, p. 90, p. 91]
- **Defendant's Motion to Dismiss (DE 13):** [p. 1 - 7]
- **Defendant's Motion to Dismiss Amended Complaint (DE 27):** [p. 1 - 7]
- **Plaintiff's Response in Opposition to Defendant's Motion to Deem Plaintiff a Vexatious Litigant and Enjoin Further Filings (DE 16):** [p. 20]
- **Plaintiff's Request for Extension of Time and Fallback Response to Motion to Deem Plaintiff Vexatious (DE 36):** [p. 8, p. 9, p. 16] (three mistakes by Plaintiff)

1           • **Appendix to Plaintiff's Request for Extension of Time and Fallback Response to**  
2 **Motion to Deem Plaintiff Vexatious (DE 36): [p. 1] (a mistake by Plaintiff)**  
3

4 This section is provided to aid the Court and Defendants in identifying the relevant pages for  
5 purposes of notice, retention, and eventual disposition.  
6

7  
8 **V. COURT POLICY ON SHREDDING AND INSUFFICIENCY UNDER JEWISH**  
9 **CUSTOM AND LAW**  
10

11 When Plaintiff last visited the Clerk's Office at the U.S. Courthouse in West Palm Beach, the  
12 Clerk informed Plaintiff that hard copies filed in this Court are retained for approximately one  
13 year and then shredded. Plaintiff respectfully emphasizes that **shredding is not an acceptable**  
14 **option under Jewish custom and law for Shaimos**. Shredding constitutes destruction and  
15 desecration of sacred Names of G-d.  
16

17 Accordingly, absent Court intervention, the ordinary retention-and-shredding policy would result  
18 in an unavoidable and profound religious violation. This Motion therefore seeks a narrowly  
19 tailored accommodation to ensure compliance both with Court policies and with Plaintiff's  
20 religious obligations.  
21

22 **VI. TRANSCRIPTION OF ORAL USE OF THE NAME**  
23

24 Plaintiff further requests that when he speaks the Name of G-d aloud in oral argument, testimony,  
25 or any proceeding before this Court, official transcripts should render the Name in an abbreviated  
26 or hyphenated form (for example, "G-d" in "In G-d We Trust" or "In G We Trust"), rather than  
27  
28

1 fully spelling it out.

2  
3 This limited accommodation will prevent additional instances of Shaimos from being generated  
4 through transcription practices, while preserving the accuracy of the record for all substantive  
5 purposes.

6  
7 **VII. REQUESTED RELIEF**

8  
9 Plaintiff respectfully requests that this Court enter an Order providing that:

10 1. **Hold on Paper Copies.** The Court and Defendants may retain paper copies of filings  
11 containing the Names of G-d for as long as necessary for the pendency of this case, including any  
12 appeals.

13  
14 2. **Notice of Disposal.** Before any destruction, shredding, or disposal of case files or  
15 Defendants' copies that contain such Names, Plaintiff shall be given reasonable advance written  
16 notice.

17 3. **Opportunity to Retrieve.** Upon notice, Plaintiff shall have the opportunity either to  
18 retrieve such documents directly (if local to South Florida) or to receive them by mail (if great  
19 distance beyond 80 kilometers from Plaintiff's residential ZIP code so requires), for the sole  
20 purpose of placing them in a genizah or arranging for burial in accordance with Jewish custom  
21 and law.

22  
23 4. **Respectful Courtesy in Future Filings.** The Government and Defendants should, to the  
24 extent practicable, avoid reproducing the Names of G-d unnecessarily in future filings, whether  
25 by abbreviation, hyphenation, or other convention.

26  
27 5. **Confidential Pages with Work Product.** If any page containing the sacred Names of G-d  
28 is also marked with confidential attorney-client privileged material or attorney work product, and

1 thus cannot be returned to Plaintiff, the U.S. Attorney or Defendants must certify to this Court,  
2 under penalty of perjury, that such page has been disposed of in accordance with Jewish Shaimos  
3 practices—specifically by deposit in a genizah or by religious burial in a Jewish cemetery.  
4

5 6. **Transcription Practices.** The Court should instruct its official court reporters, and  
6 request Defendants to instruct their transcription services, to render any spoken references (by the  
7 Plaintiff, at minimum) to the Name of G-d in abbreviated or hyphenated form (e.g., “G-d”) rather  
8 than fully spelling out the Name.

9 7. **Enforcement.** The Court shall reserve authority to hold parties in contempt should they  
10 recklessly or deliberately disregard this accommodation and dispose of sacred texts as of the date  
11 of this Motion being filed without affording Plaintiff the opportunity to provide religiously  
12 required treatment.  
13

## 14 **VII. CONCLUSION**

15  
16 This Motion seeks modest relief: to protect the sanctity of a limited number of sacred Names of  
17 G-d already appearing in the case file, while imposing no burden on electronic records or  
18 ordinary case administration. Granting this relief would respect Plaintiff's sincerely held religious  
19 obligations and prevent unnecessary desecration, consistent with the spirit of the Religious  
20 Freedom Restoration Act and the Court's broad discretion to manage its own records with  
21 sensitivity to litigants' religious concerns.  
22

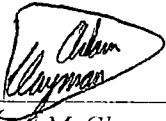
23  
24 **WHEREFORE**, Plaintiff respectfully requests that the Court grant this Motion and enter the  
25 proposed protections for the Names of G-d appearing in printed filings, transcripts, and case  
26 materials.  
27  
28



s/Plaintiff David Clayman, Currently *Pro se*  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this Monday, the 8th day of September, 2025, I mailed a copy of this document to the Court via certified mail and electronically served a copy of this response to the opposing counsel on the case.



/s/ David M. Clayman  
Pro Se Plaintiff

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9589 0710 5270 2652 1263 26

Clerk of Courts  
US District Court for Southern District FL  
701 Clematis Street, Room 202  
West Palm Beach, FL 33401

Retail



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RDC 99

INSPECTED

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OF THE RETURN ADDRESS, FOR POSTAGE PAID LINE